

**Carolina West Wireless, Inc.
P.O. Box 959
Wilkesboro, North Carolina 28697**

**E911 Location Accuracy Progress Report
47 C.F.R. § 20.18(i)(4)(ii)
PS Docket No. 07-114**

Carolina West Wireless, Inc. is meeting compliance deadlines prescribed by the Federal Communications Commission in *Wireless E911 Location Accuracy Requirements*, Fourth Report and Order, PS Docket No. 07-114, FCC 15-9 (released Fed. 3, 2015) (*Fourth Report and Order*), and codified in 47 CFR § 20.18(i), *et seq.*

Carolina West Wireless works diligently and covers costs necessary to provide public safety with accurate location data for emergency callers. Over the past twelve months, Carolina West Wireless has timely performed its *Fourth Report and Order* location accuracy obligations and has submitted reporting and compliance documentation to the FCC by the following deadlines:

February 1, 2018

A Non-Nationwide Carrier Live 911 Call Report was submitted to the FCC in PS Docket No. 07-114, providing aggregate live 911 call data, covering reporting period January through December 2017, for Carolina West Wireless' CDMA network (internally hosted) and VoLTE network (externally hosted by Verizon Wireless' LTE in Rural America program).. As a non-nationwide CMRS provider that does not provide coverage in any of the six Test Cities, and in accordance with 47 CFR § 20.18(i)(3)(ii)(E), Carolina West Wireless' 911 live call data is collected and reported based on the largest county its service area footprint. The report was sent to the National Emergency Number Association (NENA), the Association of Public-Safety Communications Officials (APCO) and the National Association of State 911 Administrators (NASNA).

April 3, 2018

In accordance with 47 CFR § 20.18(i)(2)(i)(B)(2), Carolina West Wireless had begun to provide dispatchable location or x/y location information within 50 meters for 50 percent of all wireless 911 calls.

June 4, 2018

As a non-nationwide CMRS provider that does not provide coverage in any of the six Test Cities, and in accordance with 47 CFR § 20.18(i)(2)(iii), Carolina West Wireless submitted to the FCC certification that as of April 3, 2018, it did not provide service or report live call data in one or more of the Test Cities, was providing dispatchable location

or x/y location information within 50 meters for 50 percent of all wireless 911 calls, had deployed the indoor location technology or technologies used in its networks consistently with the manner in which such technologies have been tested in the test bed, and had verified based on its own live call data that it was in compliance with the two-year benchmark set forth at 47 CFR § 20.18(i)(2)(i)(B)(2).

August 1, 2018

A Non-Nationwide Carrier Live 911 Call Report was submitted to the FCC in PS Docket No. 07-114 on or before August 1, 2018, providing aggregate live 911 call data covering reporting period January through June 2018, for Carolina West Wireless' CDMA and VoLTE networks, and the report was sent to NENA, APCO and NASNA.

August 3, 2018

Carolina West Wireless makes available to PSAPs uncompensated barometric data for any 911 call placed from any handset that has the capability to deliver barometric sensor data, in compliance with 47 C.F.R. § 20.18(i)(2)(ii)(A).

Carolina West Wireless has adopted procedures that comply with FCC indoor accuracy requirements:

Carolina West Wireless retains for two years all testing and live call data gathered for Non-Nationwide Carrier Live 911 Call Reports, pursuant to 47 C.F.R. § 20.18(i)(3)(iii).

Carolina West Wireless delivers x- and y-axis (latitude, longitude) confidence and uncertainty (C/U) data for all wireless 911 calls - whether placed from indoors or outdoors - at the request of a Public Safety Answering Point (PSAP), on a per-call basis, with a uniform confidence level of 90 percent, per 47 CFR § 20.18(j).

Carolina West Wireless collects and retains for two years information on all wireless 911 calls placed on its network, including the positioning source method used to provide a location fix associated with the call. The data is made available to PSAPs upon request in accordance with 47 CFR § 20.18(k).

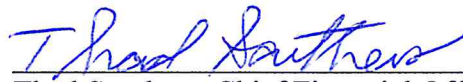
Carolina West Wireless will continue to meet FCC indoor location accuracy requirements of 47 CFR § 20.18, utilizing the expertise of highly qualified providers of E911 technology services.

TeleCommunication Systems, Inc. / Comtech Telecommunications (Comtech) provides Carolina West Wireless a wireless E911 solution using the efficient, open architecture of the Xypoint® Location Platform (XLP) and traditional landline networks to delivery public safety services. Comtech integrates with PSAPs, ALI (automatic location information) databases and local exchange carriers. Comtech's location service team provides Carolina West Wireless with end-to-end support, switch integration, database management, geographic information services (GIS), compliance expertise, services to PSAPs and cost-recovery assistance.

As the number of subscribers or 911 transactions increase, Carolina West Wireless and Comtech can add capacity and migrate XLP location services to next generation technology. Comtech facilitates advanced capabilities such as interfacing with the Evolved Serving Mobile Location Center (ESMLC) and, as it evolves, the National Emergency Address Database (NEAD).

Comtech's E911 solutions integrate with Carolina West Wireless' small cells and with new developments such as device-based hybrid location services that calculate location based on integrated sensor data. Another new advantage is that if a 911 caller's device can provide WiFi access point information, Comtech can integrate with a crowd source database to derive the caller's location. Comtech also will be able to provide location information from Android devices using Google Advanced Mobile Location, which passes location information via Short Message Service (SMS) to a Google back-end where the caller's location is derived and delivered to 911 answering points.

Carolina West Wireless and Comtech will continue to incorporate technological advancements to enhance the safety of emergency callers by delivering accurate and useful location information to emergency dispatch personnel, in keeping with FCC requirements and timelines.



Thad Southers, Chief Financial Officer

Date:

8-1-18